



Helping dairies fuel a renewable future

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Dec 9, 2019

Richard Corey
Executive Officer
Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Fuel Cell Net Energy Metering GHG Standard

Dear Mr. Corey,

California Bioenergy LLC ("CalBio") is a leading developer of dairy methane capture projects in California with over forty projects throughout the Central Valley currently in development.

Several of these projects are being developed in conjunction with Bloom Energy to efficiently and cleanly convert captured dairy biogas directly into electricity to power the dairies and electric vehicles. Our Bloom produced electricity will be substantially carbon negative since it is both i) renewable and ii) is destroying previously vented methane. We are excited to be merging Bloom's Silicon Valley technology with our Central Valley renewable fuel, providing energy resiliency to the dairy, reducing greenhouse gas emissions and cleaning the air.

We appreciate the opportunity to comment on your **Fuel Cell Net Energy Metering GHG Standard** proceeding. CalBio supports policies that reduce greenhouse gases and air pollution. As such, we support ARB's proposed greenhouse gas standard for fuel cell net energy metering projects.

Encouraging the use of non-combustion fuel Bloom fuel cells and encouraging the use of renewable gas will reduce GHGs, improve air quality, and provide resiliency through the use of an on-site non-combustion generator.

We commend ARB for developing an accurate, continually improving GHG standard that will have the important co-benefit of criteria pollution reductions and resiliency.

Sincerely,

N. Ross Buckenham
CEO